

April 24, 2024

VIA ECF

The Honorable Lewis J. Liman
U.S. District Court, Southern District of New York
Daniel Patrick Moynihan, U.S. Courthouse
500 Pearl Street
New York, New York 10007-1312

**Re: Tobias Moeller-Bertram v. Gemini Trust Co., LLC, et al.,
No. 1:23-cv-02027**

Dear Judge Liman:

In response to the Court's April 16, 2024 Order, counsel for Plaintiff Tobias Moeller-Bertram ("Plaintiff") and counsel for Defendant Gemini Trust Co., LLC ("Gemini") conferred by telephone on April 23, 2024 and now respectfully submit this joint letter motion and the accompanying proposed stipulation and order requesting that the Court grant Gemini's outstanding Motion to Compel Arbitration (ECF Nos. 14-15) and stay Plaintiff's action against Gemini pending the outcome of the arbitration proceedings. Both Gemini and Plaintiff consent to the relief in the proposed stipulation and order. No relief is being sought in this letter motion as to Plaintiff's claims against the other defendant, Digital Currency Group, Inc.

Accordingly, the undersigned counsel for Plaintiff and Gemini respectfully request that the Court enter their proposed order as set forth in Exhibit A, attached hereto.

Respectfully submitted:

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